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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CASEY ROBERTS, Individually and On  
Behalf of All Other Similarly Situated,

Plaintiff,

v.

ZUORA, INC., TIEN TZUO, and TYLER  
SLOAT,

Defendants.

No. 3:19-cv-03422-SI

**JOINT STIPULATION AND  
~~PROPOSED~~ SCHEDULING ORDER  
EXTENDING EXPERT DISCOVERY  
AND DISPOSITIVE MOTION  
DEADLINES**

Judge: Hon. Susan Illston

Dept.: Courtroom 1, 17th Floor

Date Action Filed: June 14, 2019

Pursuant to Civil Local Rule 6-2(a), Lead Plaintiff New Zealand Methodist Trust Association and Defendants Zuora, Inc., Tien Tzuo, and Tyler Sloat (collectively, “the Parties”) respectfully submit this Joint Stipulation Requesting an Order to Extend Expert Discovery and Dispositive Motion Deadlines. Good cause supports this request for relief.

WHEREAS, on April 4, 2022, this Court entered a scheduling order (Dkt. 139) setting, among other pre-trial deadlines, the deadlines for expert discovery and dispositive motion briefing and hearing.

WHEREAS, Plaintiffs have recently learned that key members of Plaintiffs’ expert witness team will be taking extended leaves overseas during the summer months of 2022 when opening and rebuttal expert reports are presently scheduled to be exchanged.

WHEREAS, in light of the foregoing, the Parties have agreed, subject to approval by the Court, to extend expert discovery and dispositive motion deadlines by approximately 30 days, as set forth in the proposed modified schedule below.

<b>ACTION</b>	<b>EXISTING DEADLINE</b>	<b>[PROPOSED] DEADLINE</b>
Expert Reports Exchanged	July 1, 2022	<b>August 5, 2022</b>
Rebuttal Expert Reports Exchanged	August 5, 2022	<b>September 9, 2022</b>
Expert Discovery Cutoff	September 9, 2022	<b>October 14, 2022</b>
Dispositive Motion(s) Filed	October 14, 2022	<b>November 18, 2022</b>
Opposition(s) to Dispositive Motion(s)	November 11, 2022	<b>December 16, 2022</b>
Reply ISO Dispositive Motion(s)	December 2, 2022	<b>January 13, 2023</b>
Hearing on Dispositive Motions	December 16, 2022	<b>TBD</b>

WHEREAS, the Parties believe that the requested modifications will not have any effect on the rest of the case schedule, including the previously Court-ordered dates for Pretrial Paperwork (April 11, 2023), Final Pretrial Conference (April 25, 2023), and Jury Trial and Selection (May 8,

2023).

**IT IS SO STIPULATED.**

Dated: May 20, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP

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*Attorneys for Lead Plaintiff New Zealand Methodist  
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1 Dated: May 20, 2022

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19 *Attorneys for Defendants*  
20 *Zuora, Inc., Tien Tzuo, and Tyler Sloat*

**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this Joint Stipulation  
Extending Expert Discovery Schedule.

Dated: May 20, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman  
Steve W. Berman

*Attorneys for Lead Plaintiff New Zealand Methodist  
Trust Association*

~~PROPOSED~~ ORDER

Pursuant to the Parties' stipulation, and good cause appearing therefor, the Parties' request to extend expert discovery and dispositive motion deadlines is hereby **GRANTED**.


The new deadlines for expert discovery and dispositive motion briefing and hearing are as follows:

ACTION	PRE-TRIAL DEADLINE
Expert Reports Exchanged	August 5, 2022
Rebuttal Expert Reports Exchanged	September 9, 2022
Expert Discovery Cutoff	October 14, 2022
Dispositive Motion(s) Filed	November 18, 2022
Opposition(s) to Dispositive Motion(s)	December 16, 2022
Reply ISO Dispositive Motion(s)	January 13, 2022
Hearing on Dispositive Motions	<del>TBD</del> February 23, 2023

The previously Court-ordered dates for Pretrial Paperwork, Final Pretrial Conference, and Jury Trial and Selection shall remain unchanged.

**IT IS SO ORDERED.**

Dated: May 23, 2022

  
 The Honorable Susan Illston  
 United States District Court Judge